

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	
	)	
Plaintiffs and	)	C.A. No. 20-613 (SB)
Counterdefendants,	)	
	)	
v.	)	<b>REDACTED - PUBLIC VERSION</b>
	)	<b>Original filing date: November 13, 2024</b>
ROSS INTELLIGENCE INC.,	)	<b>Redacted filing date: November 18, 2024</b>
	)	
Defendant and	)	
Counterclaimant.	)	

**DECLARATION OF MIRANDA D. MEANS IN SUPPORT OF PLAINTIFFS'  
REPLY BRIEF IN SUPPORT OF THEIR RENEWED MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON FAIR USE**

I, Miranda D. Means, Esq., declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, counsel of record for Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively, “Plaintiffs”). I am admitted and in good standing to practice law in the states of Massachusetts and New York, and I am admitted *pro hac vice* to practice in this District for the above-captioned case. I submit this declaration in support of Plaintiffs’ Reply in Support of Their Renewed Motion for Partial Summary Judgment on Fair Use. The statements set forth in this declaration are based on my personal knowledge and my review of the contemporaneous documents referenced and attached hereto.

2. Attached hereto as **Exhibit 139** is a true and correct copy of excerpts from the deposition of Erik Lindberg, taken March 22, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 13th day of November, 2024.

*/s/ Miranda D. Means*

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Miranda D. Means

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 13, 2024, upon the following in the manner indicated:

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*/s/ Michael J. Flynn*

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